

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE CHANGES, 2012

Docket No. N2012-1

INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO
TO USPS WITNESS DOMINIC L. BRATTA
(APWU/USPS-T5-1-5)
(January 17, 2012)

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO directs the following interrogatories to United States Postal Service witness Dominic L. Bratta (USPS-T-5). If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Instructions and Definitions applicable to these Interrogatories are contained in the Interrogatories of the American Postal Workers Union, AFL-CIO to the United States Postal Service witness David E. Williams (APWU/USPS-T1-1-4), filed on December 22, 2011, and are hereby incorporated by reference.

Respectfully submitted,

Darryl J. Anderson
Jennifer L. Wood
Counsel for American Postal Workers Union, AFL-CIO

APWU/USPS-T5-1 On page 4 of your testimony you state “[s]taffing is developed at each facility based on the equipment inventory and its utilization. Each type of equipment has a prescribed number of annual workhours allocated for preventive, corrective, and operational maintenance.”

- a) How are the allocated workhours determined?
- b) How often are these allocated workhours revised?
- c) What causes a revision to the workhours allocation to be needed?

APWU/USPS-T5-2 On page 14 of your testimony you state “[t]he current fleet of mail processing equipment is in excess of 10,000 units. Under Network Rationalization, the total number of units could be as low as 5,000 units.”

- a) What circumstances are required to get to the total number of units as low as 5,000?
- b) What is the likelihood of these circumstances coming to pass?
- c) What is the expected number of units after Network Consolidation?

APWU/USPS-T5-3 Please refer to your testimony page 15, lines 3-10. For the facilities that remain open after Network Rationalization, will there be an increased need for MOS staff?

- a) If there will be an increased need, what is the expected increase in MOS staffing at the remaining facilities?
- b) How will this affect the total protected savings of the Network Rationalization?
- c) If the MOS staffing needs after Network Rationalization has not been examined, please explain why not.

APWU/USPS-T5-4 On page 15 of your testimony you state “[t]his estimate is partially contingent on new staffing criteria based on improvements in work practices.” Please explain what the new staffing criteria will be and identify and explain the improvements in work practices.

APWU/USPS-T5-5 What portion of total utility consumption in a facility does mail processing equipment account for?